

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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: : SEALED INDICTMENT
UNITED STATES OF AMERICA : :
: : 22 Cr.
- v. - : :
: :
BEVELYN BEATTY WILLIAMS and : :
EDMEE CHAVANNES, : :
: : Defendants. : :
: :
----- X -----

22 CRIM 684

COUNT ONE

(Conspiracy to Violate Freedom of Access to Clinic Entrances)

The Grand Jury charges:

Overview

1. BEVELYN BEATTY WILLIAMS and EDMEE CHAVANNES, the defendants, are founders of At the Well Ministries, Inc., a non-profit organization started in 2014. WILLIAMS and CHAVANNES, individually and at times through At the Well Ministries, Inc., have sought to prevent lawful abortions from occurring throughout the country.

2. From at least in or about 2019, up to and including to at least in or about 2022, BEVELYN BEATTY WILLIAMS and EDMEE CHAVANNES, the defendants, agreed to and did engage in unlawful means in aid of their goal. In fact, WILLIAMS and CHAVANNES repeatedly agreed to and did use unlawful means--including force, threats of force, and physical obstruction--to injure, intimidate, and interfere with individuals seeking to obtain lawful

reproductive health services and individuals providing such services.

The Manhattan Health Center Protests

3. From at least in or about 2019 up to and including in or about 2021, BEVELYN BEATTY WILLIAMS and EDMEE CHAVANNES, the defendants, regularly protested in front of a healthcare provider located in lower Manhattan that administers a multitude of medical services, including abortion care and other reproductive health services (the "Health Center"). The Health Center employs healthcare providers and administrative staff, and works with volunteers who escort patients into the Health Center. The Health Center has two entrances. One entrance is used primarily by patients and volunteers and the other entrance is used primarily by staff members.

4. At the Well Ministries, Inc. publicized an event at the Health Center to take place on June 19, 2020 and June 20, 2020. On or about June 19, 2020 and June 20, 2020, in connection with this event, BEVELYN BEATTY WILLIAMS and EDMEE CHAVANNES, the defendants, traveled to and were present at the Health Center. During that time, among other things, WILLIAMS and CHAVANNES threatened and used force against Health Center patients and staff members, and blocked access to the Health Center, including:

a. On or about June 19, 2020, while standing outside of the Health Center, WILLIAMS stated, on a livestreamed video on her Facebook account:

This is going to be a wonderful day. We are going to terrorize this place. And I want the manager to hear me say that. We are going to terrorize this place. More people are coming. More and more and more and more and more. And we're going to make sure we terrorize you guys so good.

While saying this, at times WILLIAMS spoke at close range into the ear of a Health Center staff member.

b. On or about June 19, 2020, CHAVANNES threatened a Health Center staff member ("Victim-1") by leaning her body toward Victim-1 at close range, forcing Victim-1 against metal barricades set up by the New York City Police Department around the Health Center's patient entrance, while yelling "do not touch me" within inches of Victim-1's face.

c. At various times on June 19 and 20, 2020, during the operating hours of the Health Center, WILLIAMS and CHAVANNES stood directly in front of the Health Center entrances. WILLIAMS and CHAVANNES initially blocked the patient entrance, causing the Health Center to have to divert patients to enter through the staff entrance. WILLIAMS and CHAVANNES responded by moving in front of the staff entrance and directing others to do so as well.

d. On or about June 20, 2020, WILLIAMS pressed her body against the door to the Health Center's patient entrance and refused to move, preventing a Health Center volunteer ("Victim-2") from entering the Health Center. As Victim-1 attempted to open the door for Victim-2, WILLIAMS leaned against the door, crushing Victim-1's hand. Victim-1 yelled, "She's crushing my hand," but WILLIAMS remained against the door, trapping Victim-1's hand and injuring it. While WILLIAMS pressed against the door and after Victim-1 had yelled that her hand was being crushed, WILLIAMS sang, "We shall not be moved."

e. On or about June 20, 2020, WILLIAMS stated in part and among other things, on a livestream video on her Facebook account, "We gonna stand here and we ain't moving. We not moving. We're standing here, so I guess no women will be coming in for abortions today. It's a warzone."

The Defendants' Conduct After June 2020

5. Following the events of June 2020, BEVELYN BEATTY WILLIAMS and EDMEE CHAVANNES, the defendants, continued to use unlawful means throughout the country in an effort to seek to injure, intimidate, and interfere with individuals obtaining or providing services in facilities that provide reproductive health services.

a. In or about January 2022, WILLIAMS and CHAVANNES, traveled to and were present outside of a reproductive health center in Fort Myers, Florida intending to prevent individuals seeking and providing reproductive health care from accessing the health center.

b. In or about January 2022, WILLIAMS and CHAVANES repeatedly directed other individuals to block health center entrances in Fort Myers, Florida.

c. In or about July 2022, WILLIAMS and CHAVANNES, along with at least one other person, traveled to and sought to enter two reproductive health centers in Nashville, Tennessee by falsely purporting to be seeking health care services. While filming a video as she tried to gain entrance to one health center, WILLIAMS stated, among other things, that it was her intention to "terrorize" the building if she was not permitted entrance. WILLIAMS also stated, in part and among other things, "Either they going to let us in, or we're going to take the whole building down. It's up to them."

d. In or about July 2022, WILLIAMS and CHAVANNES, along with at least one other person, traveled to and entered multiple reproductive health centers in Atlanta, Georgia to prevent individuals seeking and providing reproductive health care

from accessing the health centers. In one health center, WILLIAMS and CHAVANNES blocked patients' access to the facility by standing inside the vestibule yelling that if patients wanted to enter the facility, they would have to get past WILLIAMS and CHAVANNES.

e. In or about August 2022, WILLIAMS and CHAVANNES, traveled to and entered multiple reproductive health centers in Brooklyn, New York by falsely purporting to seek services. Upon entering the facilities, WILLIAMS and CHAVANNES recorded themselves yelling in the patient waiting rooms. On these recordings, which were broadcast on Facebook, WILLIAMS and CHAVANNES stated full names of health center staff members and captured images of health center staff members and patients.

STATUTORY ALLEGATIONS

6. From at least in or about 2019 up to and including at least in or about 2022, in the Southern District of New York and elsewhere, BEVELYN BEATTY WILLIAMS and EDMEE CHAVANNES, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit an offense against the United States, to wit, to violate the freedom of access to clinic entrances, in violation of Title 18, United States Code, Section 248(a)(1).

7. It was a part and an object of the conspiracy that, BEVELYN BEATTY WILLIAMS and EDMEE CHAVANNES, the defendants, and others known and unknown, would and did by force and threat of force and by physical obstruction, intentionally injure, intimidate and interfere with and attempt to injure, intimidate and interfere with, a person because that person was and had been, and in order to intimidate such person and another person and a class of persons from, obtaining and providing reproductive health services, thereby resulting in bodily injury, in violation of Title 18, United States Code, Sections 248(a)(1) and (b)(2).

Overt Acts

8. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed and caused to be committed in the Southern District of New York and elsewhere:

a. On or about June 19, 2020, in Manhattan, CHAVANNES threatened Victim-1 by leaning her body toward Victim-1 at close range, forcing Victim-1 against metal barricades outside the Health Center, while yelling "do not touch me" within inches of Victim-1's face.

b. On or about June 20, 2020, in Manhattan, WILLIAMS pressed her body against a Health Center door and crushed the hand of Victim-1 in the door, thereby resulting in bodily injury.

c. In or about January 2022, WILLIAMS and CHAVANNES directed other individuals to block health center entrances in Fort Myers, Florida.

d. In or about July 2022, WILLIAMS and CHAVANNES blocked patient access to a health center in Atlanta, Georgia by standing inside the center's vestibule and yelled threatening comments at individuals believed to be health center patients.

(Title 18, United States Code, Section 371.)

COUNT TWO

(Violating Freedom of Access to Clinic Entrances)

The Grand Jury further charges:

9. The allegations contained in paragraphs 1 through 5 of this Indictment are repeated and realleged as if fully set forth within.

10. On or about June 19, 2020 and June 20, 2020, in the Southern District of New York and elsewhere, BEVELYN BEATTY WILLIAMS, the defendant, by force and threat of force and by physical obstruction, intentionally injured, intimidated and interfered with, and attempted to injure, intimidate and interfere

with, a person because that person was and had been, and in order to intimidate such person and another person and a class of persons from, obtaining and providing reproductive health services, thereby resulting in bodily injury, to wit, WILLIAMS used force, threats of force, and physical obstruction to injure, intimidate, and interfere with Health Center patients seeking reproductive health services and Health Center providers seeking to provide reproductive health services, thereby resulting in bodily injury to Victim-1.

(Title 18, United States Code, Sections 248(a)(1), (b)(2), and 2.)

COUNT THREE

(Violating Freedom of Access to Clinic Entrances)

The Grand Jury further charges:

11. The allegations contained in paragraphs 1 through 5 of this Indictment are repeated and realleged as if fully set forth within.

12. On or about June 19, 2020 and June 20, 2020, in the Southern District of New York and elsewhere, EDMEE CHAVANNES, the defendant, by force and threat of force and by physical obstruction, intentionally injured, intimidated and interfered with, and attempted to injure, intimidate and interfere with, a person because that person was and had been, and in order to

intimidate such person and another person and a class of persons from, obtaining and providing reproductive health services, to wit, CHAVANNES used threats of force and physical obstruction to injure, intimidate, and interfere with Health Center patients seeking reproductive health services and Health Center providers seeking to provide reproductive health services.

(Title 18, United States Code, Sections 248(a)(1), (b)(2), and 2.)

[REDACTED]
FOREPERSON

Damian Williams /S.B.
DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES OF AMERICA

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(18 U.S.C. §§ 371, 248(a)(1), (b)(2), and
2.)

DAMIAN WILLIAMS
United States Attorney

[REDACTED]
Föreperson